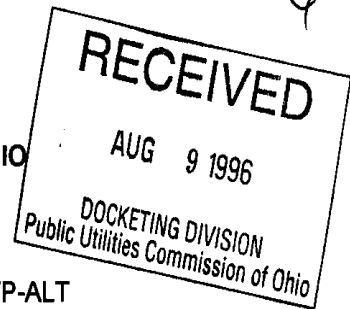


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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Application of )  
Cincinnati Bell Telephone Company )  
for Approval of an Alternative Form )  
of Regulation and for a Threshold )  
Increase in Rates )

Case No. 93-432-TP-ALT

In the Matter of the Application of )  
Cincinnati Bell Telephone Company )  
for Approval of a Retail Pricing Plan )  
Which May Result in Future Rate )  
Increases )

Case No. 96-707-TP-UNC

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MOTION OF MCI  
TELECOMMUNICATIONS CORPORATION  
FOR LEAVE TO INTERVENE

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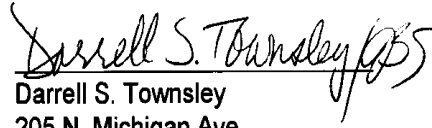
Now comes MCI Telecommunications Corporation (MCI) and moves for leave to intervene in the above-captioned proceeding pursuant to R.C. §4903.221 and Rule 4901-1-11 Ohio Administrative Code. A memorandum in support of this motion is attached hereto and incorporated by reference herein.

Respectfully submitted,

*Handwritten signature of Judith B. Sanders*

Judith B. Sanders  
BELL, ROYER & SANDERS, CO. LPA  
33 S. Grant Ave.  
Columbus, Ohio 43215  
(614) 228-0704

This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.  
Technician *Handwritten signature* Date Processed *Aug 12, 1996*

Handwritten signature of Darrell S. Townsley in cursive script, with the initials 'DS' visible at the end.

Darrell S. Townsley  
205 N. Michigan Ave.  
Chicago, IL 60601  
(312) 938-3395

ATTORNEYS FOR MCI  
TELECOMMUNICATIONS  
CORPORATION

Date: August 9, 1996

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Cincinnati Bell Telephone Company	)	
for Approval of an Alternative Form	)	Case No. 93-432-TP-ALT
of Regulation and for a Threshold	)	
Increase in Rates	)	

In the Matter of the Application of	)	
Cincinnati Bell Telephone Company	)	
for Approval of a Retail Pricing Plan	)	Case No. 96-707-TP-UNC
Which May Result in Future Rate	)	
Increases	)	

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**MEMORANDUM IN  
SUPPORT OF MOTION FOR  
LEAVE TO INTERVENE**

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On July 18, 1996 Cincinnati Bell Telephone Company (CBT) filed an application seeking approval to make changes to its existing alternative regulation (altreg) plan, which plan was approved in Case No. 93-432-TP-ALT in accordance with a stipulation signed by all the parties to the case. By entry dated August 2, 1996 Attorney Examiner Jones requested comments by August 9, 1996 from interested parties on two threshold issues raised by CBT's proposal: whether the proposal is an appropriate amendment to the current altreg plan; and, if so, how the Commission should proceed with its consideration of the proposal. MCI has joined with the Office of Consumers' Counsel (OCC), AT&T Communications of Ohio (AT&T), Time Warner Communications of Ohio (Time Warner), and the Ohio Cable Telecommunications Association (OCTVA) in filing

comments regarding the CBT proposal and a request to suspend the application. With this motion, MCI seeks leave to intervene in this proceeding.

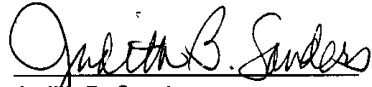
MCI Telecommunications Corporation (MCI) is an interexchange telecommunications company providing inter and intraLATA long distance service throughout the state of Ohio. MCI's affiliate, MCImetro Access Transmission Services, Inc. (MCImetro), provides non-switched access services in Hamilton, Cuyahoga and Franklin counties and switched local exchange services in Cuyahoga, Franklin and Montgomery counties. As the provider of these services, MCI both competes with CBT and relies upon CBT to provide network access and other network elements which are essential to MCI's business. MCI intervened and actively participated in CBT's altreg case, Case No. 93-432-TP-ALT, and was a signatory party to the stipulation.

As in the altreg case, MCI has a substantial interest in the outcome of this proceeding which cannot be protected by other parties to the case. CBT is still the monopoly provider of access in its service territory and MCI must pay access charges to CBT. MCI's participation in this proceeding will not unduly delay the outcome, nor will MCI's intervention prejudice the rights of other parties. MCI will contribute to a just and expeditious resolution of the case by assisting with the development of a full record concerning the important issues presented by CBT's proposal. As discussed in more detail in the joint comments, the Commission should follow the procedural schedule established for the evaluation of altreg plans, and it is appropriate that MCI be permitted intervention in such a process.

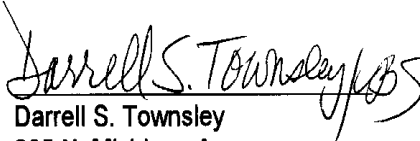
MCI's request for intervention is reasonable and should be granted forthwith for

the reasons above stated.

Respectfully submitted,



Judith B. Sanders  
BELL, ROYER & SANDERS, CO. LPA  
33 S. Grant Ave.  
Columbus, Ohio 43215  
(614) 228-0704



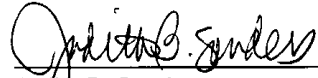
Darrell S. Townsley  
205 N. Michigan Ave.  
Chicago, IL 60601  
(312) 938-3395

ATTORNEYS FOR MCI  
TELECOMMUNICATIONS  
CORPORATION

Date: August 9, 1996

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing motion for leave to intervene on the parties listed below, via U.S. first class mail, postage prepaid, this 9th day of August, 1996.

  
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